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all claimed features be disclosed or suggested by the prior art, along with objective evidence of the suggestion, teaching or motivation to combine or modify prior art references, as "[c]ombining prior art references without evidence of such a suggestion, teaching or motivation simply takes the inventor's disclosure as a blueprint for piecing together the prior art to defeat patentability -- the essence of hindsight." In re Dembiczak, 50 USPQ2d 1614, 1617 (Fed. Cir. 1999).

Applicant respectfully submits, however, that the Examiner is relying on hindsight in making this combination, as the Examiner has merely utilized Applicant's disclosure as a blueprint, and has failed to provide sufficient evidence of motivation to combine the references to suggest the combination of features recited in claim 1.

In particular, Applicant respectfully submits that the references cited by the Examiner fail to disclose or suggest a plug-in module capable of both connecting a handheld computer to an adapter on a logically-partitioned computer and storing program code configured to emulate a console for a logical partition in a logically-partitioned computer. Nor do the cited references disclose or suggest that a handheld computer may be configured to emulate such a console using program code that is resident in a plug-in module coupled to the handheld computer.

Mills discloses a combination I/O and memory card. However, as recognized by the Examiner, Mills does not disclose or suggest a combination I/O and memory card that is further adapted to store program code used to configure a handheld computer to emulate a console. Indeed, Applicant notes that among the various embodiments disclosed in Mills at cols. 7 and 8, none of these embodiments disclose or suggest the storage of program code in the combination card that is used to access a remote computer over the I/O interface, much less to emulate a console.

Likewise, Kauffman discloses consoles resident in various logical partitions in a logically-partitioned computer (see, e.g., Fig. 2), as well as the ability for a PC, workstation, or local access terminal (LAT) to display console information (col. 7, lines 55-60). However, Kauffman does not disclose or suggest any form of plug-in module for any of these devices that includes program code used to configure such devices to

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emulate a console, much less a module that additionally provides a mechanism for interfacing with a remote computer.

MochaPocketTN5250 discloses program code for a handheld computer that can be used to emulate a console. However, the reference does not disclose or suggest that such program code may be resident in a plug-in module that additionally includes a mechanism for interfacing with a remote computer.

In short, none of the references disclose or suggest, alone or in combination, a plug-in module that includes program code capable of being used to enable a device coupled to the module to emulate a console over an interface that is also provided in the plug-in module. The fact that the prior art may disclose that program code can be stored in a plug-in module, and that program code may be used to emulate a console, still falls short of teaching that a plug-in module for a handheld computer may include program code that is specifically used to configure that handheld computer to emulate a console.

The Examiner argues, at paragraphs 3.9 and 3.10, that the motivation to combine the references is provided by col. 7, lines 55-60 of Kauffman, which merely discloses that a PC may be used to interface with a console running on a logically-partitioned computer. Applicant respectfully submits that this motivation is insufficient because it does not appreciate the desirability or benefits of using a plug-in module that is specifically configured to both provide the interface to the logically-partitioned computer and to provide program code that is capable of configuring the device to which the module is attached to emulate a console.

Absent sufficient evidence of motivation, the Examiner's rejection necessarily must rely on hindsight, and as such, Applicant submits that the Examiner has failed to establish a *prima facie* case of obviousness as to claim 1, and that the rejection thereof should be withdrawn. Reconsideration and allowance of claim 1, and of claims 2-14 which depend therefrom, are therefore respectfully requested.

Next, with respect to claim 3, this claim depends from claim 1, and additionally recites that configuring the handheld computer to emulate the console includes downloading the program code from the plug-in module to the handheld computer. The

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Examiner admits that Mills does not disclose this feature, but relies on Dye for allegedly teaching this feature at col. 1, lines 55-62. While this passage discloses in general the concept of copying instructions from flash memory to DRAM or SRAM for execution, the reference does not disclose or suggest providing such capability in a plug-in module for a handheld computer for the purpose of enabling the handheld computer to emulate a console. It appears in this instance that Applicant's invention is merely being used as a blueprint for the rejection, as there is simply no suggestion in the reference of the desirability for providing this capability in a plug-in module for a handheld computer. The configuration recited in claim 3 provides a unique and unappreciated advantage over the cited references in that a user is able to readily configure a general purpose handheld computer for use in emulating a console for a logically-partitioned computer merely through the installation of a plug-in module that provides both the capability for interfacing with the logically-partitioned computer and the program code that handles the emulation. Applicant submits that this configuration is not appreciated by the cited references, and as such, reconsideration and withdrawal of the rejection of claim 3 are requested for this additional reason.

Next, with respect to claim 10, this claim depends from claim 9, and additionally recites the steps of disconnecting a cable connected to a first adapter for a first logical partition and connecting the cable to a second adapter for a second logical partition to perform a system administration operation on the second logical partition. In rejecting the claim, the Examiner essentially admits that Kauffman does not disclose this configuration, but takes Official Notice that it was old to disconnect a cable from one port and connect it to another for the purpose of enabling one console to interface with multiple partitions.

In taking Official Notice, however, the Examiner ignores the teachings of Kauffman that effectively teach away from Applicant's claimed configuration. In particular, col. 7, lines 55-60 disclose the use of a multiplexer 226 to enable a single workstation to interface with multiple partitions, and thus eliminate the need for "separate" workstations for each partition. Kauffman therefore eliminates the need for

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multiple workstations through a different mechanism (a multiplexer) than the configuration recited in claim 10. As such, since Kauffman discloses a different solution, one of ordinary skill in the art would not be motivated to modify Kauffman to utilize a single workstation that is connected and disconnected to and from different partitions via a single cable. Reconsideration and withdrawal of the rejection of claim 10 are therefore requested for this additional reason.

Next, with respect to dependent claim 13, this claim additionally recites the concept of performing first and second system administration operations while a user is concurrently authenticated to first and second logical partitions. The Examiner has asserted that this concept is disclosed by Arndt. Applicant respectfully traverses this rejection, however, as Arndt is not properly citeable against the present application in an obviousness rejection pursuant to 35 U.S.C. § 103(c), which excludes any commonly-owned reference that is only citeable against an application under 35 U.S.C. § 102(e), (f) or (g). Arndt meets the requirements of 35 U.S.C. § 103(c) as the reference is only citeable against the instant application under 35 U.S.C. § 102(e) (given its earliest publication date of May 10, 2005 is subsequent to Applicant's effective filing date of December 14, 2001), and as the reference was commonly owned with the instant application at the time the invention of the instant application was made. See MPEP 706.02(l). As evidence of such common ownership, Applicant refers the Examiner to Reel 12387, Frame 520, and Reel 10870, Frame 642 of the USPTO Assignment Records.

As Arndt is not properly citeable against claim 13, Applicant respectfully submits that the rejection of claim 13 should be withdrawn. Moreover, Applicant submits that the remaining art of record does not disclose the concept of performing first and second system administration operations while a user is concurrently authenticated to first and second logical partitions (as was admitted by the Examiner in paragraph 14.3 of the subject Office Action). Reconsideration and allowance of the claim are therefore respectfully requested.

Next with regard to the rejection of independent claim 14, this claim generally recites a computer system that includes a logically-partitioned computer including a plurality of logical partitions, an adapter coupled to the logically-partitioned computer and configured to access at least one of the plurality of logical partitions, and a handheld computer coupled to the adapter via a plug-in module coupled to the handheld computer and connected to the adapter via a cable, wherein the plug-in module includes program code configured to control the handheld computer to emulate a console for the at least one logical partition. As discussed above in connection with claim 1, however, the combination of references cited by the Examiner (Mills, Kauffman and MochaPocketTN5250, does not suggest a plug-in module that includes program code capable of being used to enable a device coupled to the module to emulate a console over an interface that is also provided in the plug-in module. Claim 14 is therefore non-obvious over the prior art of record for the same reasons as presented above for claim 1. Reconsideration and allowance of claim 14 are therefore respectfully requested.

Next with regard to the rejection of independent claim 15, this claim generally recites a plug-in module for a handheld computer that includes a network interface configured to receive a network connector, a memory, and program code resident in the memory and configured to control a handheld computer to emulate a console that communicates with a multi-user computer over the network interface.

In rejecting the claim, the Examiner relies on the combination of Mills and Powderly. As discussed above in connection with claim 1, however, Mills does not disclose or suggest a plug-in module that includes program code capable of being used to enable a device coupled to the module to emulate a console over an interface that is also provided in the plug-in module. The Examiner admits as such in paragraph 15.4 of the subject Office Action.

However, the Examiner relies on Powderly, and in particular, the abstract, col. 1, lines 29-35 and col. 2, line 65 to col. 3, line 2, for allegedly disclosing program code resident in a memory and configured to emulate a console that communicates with a multi-user computer. While Powderly does disclose an adapter card 18 that includes a

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network interface and program code that communicates with a multi-user computer, it is important to note that adapter card 18 is installed in multi-user computer 14, and not in workstation 16 (see col. 3, lines 21-42). Indeed, adapter card 18 and workstation 16 communicate with one another over an intervening network 12 (e.g., the Internet). Thus, to the extent the Examiner considers the workstation 16 of Powderly to be capable of being replaced with a handheld computer, adapter 18 does not correspond to a plug-in module for a handheld computer that incorporates program code configured to control a handheld computer to emulate a console. Accordingly, Applicant respectfully submits that the combination of Mills and Powderly does not establish a *prima facie* case of obviousness as to claim 15. Reconsideration and allowance of claim 15, and of claims 16-22 which depend therefrom, are therefore respectfully requested.

Next, with respect to claim 22, this claim is rejected in part based upon Arndt. As the reference is not properly citeable against the instant application, Applicant respectfully submits that the rejection of claim 22 should be withdrawn. Reconsideration and allowance of claim 22 are therefore respectfully requested.

Next, with regard to the rejection of independent claim 23, this claim generally recites an apparatus that includes a handheld computer including a module interface, and a plug-in module coupled to the module interface of the handheld computer. The plug-in module includes a network interface configured to receive a network connector, a memory, and program code resident in the memory and is configured to control the handheld computer to emulate a console that communicates with a multi-user computer over the network interface.

In rejecting claim 23, the Examiner relies on Mills and Powderly. However, as discussed above in connection with claim 15, Mills and Powderly do not disclose a plug-in module for a handheld computer that includes program code capable of being used to enable a device coupled to the module to emulate a console over an interface that is also provided in the plug-in module. The Examiner admits that Mills does not disclose a plug-in module with program code configured to control a handheld computer to emulate a console, and instead relies on Powderly for allegedly disclosing this concept. As

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discussed above in connection with claim 15; however, Powderly discloses an adapter card 18 that interfaces with a multi-user computer, rather than a workstation, much less a handheld computer. Thus, to the extent the Examiner considers the workstation 16 of Powderly to be capable of being replaced with a handheld computer, adapter 18 does not correspond to a plug-in module for a handheld computer that incorporates program code configured to control a handheld computer to emulate a console. Accordingly, Applicant respectfully submits that the combination of Mills and Powderly does not establish a *prima facie* case of obviousness as to claim 23. Reconsideration and allowance of claim 23 are therefore respectfully requested.

As a final matter, Applicant has added new claim 24, which depends from claim 9 and recites similar subject matter to each of claims 11 and 13 to the extent that the claim recites the concept of authenticating a user with each of first and second logical partitions via the emulated console while first and second cables are coupled respectively between first and second adapters on the logically-partitioned computer and first and second interfaces in the plug-in module, such that the first and second system administration operations are performed while the user is concurrently authenticated to the first and second logical partitions. Of note, the only art argued by the Examiner to disclose the concept of performing system administration operations while a user is concurrently authenticated to first and second logical partitions is Arndt, which as noted above, is not properly citeable pursuant to 35 U.S.C. §103(c).

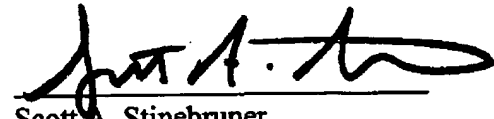
Moreover, among the remaining art of record, most notably Laity, which was cited against claim 11, there is no disclosure or suggestion of concurrent authentication to two logical partitions, nor of coupling two interfaces in a plug-in module to two adapters allocated to first and second logical partitions in a logically-partitioned computer (as discussed above in connection with claim 11). Laity discloses a PCMCIA card with multiple network interfaces; however, there is no disclosure or suggestion in the reference of any capability of providing concurrent authentication to two logical partitions via those multiple network interfaces. Accordingly, Applicant submits new claim 24 is allowable over the prior art of record.

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In summary, Applicant respectfully submits that all pending claims are novel and non-obvious over the prior art of record. Reconsideration and allowance of all pending claims are therefore respectfully requested. If the Examiner has any questions regarding the foregoing, or which might otherwise further this case onto allowance, the Examiner may contact the undersigned at (513) 241-2324. Moreover, if any other charges or credits are necessary to complete this communication, please apply them to Deposit Account 23-3000.

15 SEP 2005
Date

Respectfully submitted,



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